

UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF VIRGINIA  
LYNCHBURG DIVISION

IN RE: DAVID J. CARPENTER  
JOANN F. CARPENTER  
Debtor(s)

CHAPTER 13  
CASE NO. 09-61803

\_\_\_\_\_  
MIDFIRST BANK

Plaintiff

v.

DAVID J. CARPENTER  
JOANN F. CARPENTER

Defendant(s)  
\_\_\_\_\_

NOTICE OF HEARING ON  
DEBTORS' RESPONSE TO NOTICE OF DEFAULT

Please take notice that the undersigned Counsel for the above-named Debtor(s), filed a Response to Notice of Default, a true copy of which is attached hereto, and shall submit the same to the Honorable William E. Anderson, U.S. Bankruptcy Judge, for approval on *January 20, 2011* at *9:30 a.m.*, or as soon thereafter as the parties may be heard, in the *U.S. Bankruptcy Court, 1101 Court Street, Lynchburg, VA*. Please plan to attend in order to protect your interest.

I do hereby certify that a copy of this Notice and the Response has been forwarded to the Chapter 13 Trustee, the Debtor(s) and the Plaintiff on the aftermentioned date.

Date: 12/07/10

DAVID J. CARPENTER  
JOANN F. CARPENTER

/s/ Stephen E. Dunn  
Of Counsel

Stephen E. Dunn, Esq.  
Stephen E. Dunn, PLLC  
Counsel for Debtor(s)  
201 Enterprise Drive, Ste A  
Forest, VA 24551

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**DEBTORS' RESPONSE TO NOTICE OF DEFAULT**

Comes now the Debtor(s), by Counsel, and in response to the Notice of Default filed herein by *MIDFIRST BANK*, responses and states to this Court as follows:

1. That the Debtors are not in arrears to the extent as alleged in the Notice of Default;
2. That good cause exists for continuation of the automatic stay.

Wherefore, the Debtor(s) respectfully request that the automatic stay continue until the matter may be heard by the Court and for such other and further relief as the nature of their case may require.

Date: 12/07/10

DAVID J. CARPENTER  
JOANN F. CARPENTER

/s/ Stephen E. Dunn  
Of Counsel

Stephen E. Dunn, Esq.  
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